12/6/94

PI PA REVIEW ROUTE SLIP

Date

OUTING AND TRANSMITTAL SLIP

ame, office symbol, room number, ilding, Agency/Post)		Initials	Date
Section Chief Nancy N-dcl (H-3-1)	-review		
Chief ~~H-4-4~~ (H-3-1)	-review		
~~PRC~~	~~-log in~~		
~~Schwinn H-4-1~~	-approve		
~~PRC~~	~~log in final~~		
Smith H-4-4	-copy &distribute		
	-return original to staff		

Action	File	Note and Return	
Approval	For Clearance	Per Conversation	
As Requested	For Correction	Prepare Reply	
Circulate	For Your Information	See Me	
Comment	Investigate	Signature	
Coordination	Justify		

EMARKS

Review For GNB, Inc.

Attached

eck IF:

✓ High Priority

__ (h) Order Candidate

__ Imminent & Substantial Endangerment

- PA Review Form ✓
- NCAPS Sheets ✓
- Stabilization Checklist ✓
- Contract Performance Form N/A
- RCRIS Entry Form ✓

DO NOT use this form as a RECORD of approvals, concurrences, disposals clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Frank Gardner (H-3-1)

Room No.—Bldg. ~~8~~ 10160

Phone No. ~~8~~ 2039

5041-102

OPTIONAL FORM 41 (Rev. 7-76)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

<<ENFORCEMENT CONFIDENTIAL>>

MEMORANDUM

DATE: December 6, 1994

SUBJECT: RFA Review

Facility: GNB Inc. (formerly Gould Inc) RFA date: 10/31/90

FROM: Frank Gardner

TO: Larry Bowerman, Chief
Corrective Action Section

I. FACILITY DESCRIPTION

Facility Name: GNB Inc. Los Angeles Smelter (formerly Gould Inc.)

Address: 2700 South Indiana Street
Los Angeles (Vernon), CA 90023
Los Angeles County

EPA ID Number: CAD 097 854 541

DTSC Region: 3

RWQCB Region: 4, Los Angeles

A. Brief Description of Facility Operations and Hazardous Waste Management:

GNB is a secondary lead smelter that buys lead-bearing wastes (mostly spent automotive batteries) and scrap lead from other facilities and smelts them onsite into new lead ingots. The 24 acre site is located in an industrial area of Vernon, California. Prior to 1922, a meat rendering plant was located on the site. Morris Kirk and Sons smelted lead on site from 1922 to 1979 (Morris Kirk and Sons became a division of NL industries in 1973). Gould Inc. bought the site and continued operations from 1979 to 1984. GNB bought the facility in 1984 and continues to operate it at present. Lead smelting operations began at this site in

1922 in the southeast corner of the site, gradually expanding over the next 60 years to cover most of the site. The facility was reconstructed in 1982 by Gould Inc.

Lead-acid batteries received at GNB for recycling are stored, cracked, drained, washed, and separated into their component materials, namely lead, plastic, and rubber. Lead is smelted onsite, and the rubber is used to fuel the smelting furnaces. The plastic chips are trucked to KW plastics in Bakersfield for plastic recycling (a sometimes sloppy process that has resulted in STLC-hazardous lead-containing wastewater dripping from the trucks onto Interstate 5).

The main process units included in the onsite lead smelting operations include battery receiving buildings, raw material preparation system, battery crushers, reverbatory furnace, blast furnace, and baghouses. During the RFA, a total of 38 SWMUs and 2 AOCs were documented. Of the 38 SWMUs, 11 have had documented releases, namely SWMUs 3,6,9,10,11,12,14,15,24,28,&29. According to RCRIS, at least six of the SWMUs at this site are RCRA-regulated units.

B. SWMU Release Inventory:

The following is a table of Solid Waste Management Units (SWMUs) releases and release potential to the various media. Releases are described with either a "D" for Documented, a "V" for Visual, or a "P" for Potential. Potential releases are further characterized as "H," "M," or "L" for High, Medium and Low.

SWMU #	Name	Soil	GW	SW	Air
1	Earthen Disposal Pit	PH	PM	PL	PL
2	Acid Collection/Neutralization Tank	PM	PM	PM	PL
3	Battery Storage Area	V	PM	PM	PL
4	Effluent Treatment Area	PL	PL	PM	PL
5	WW Treatmt Sludge Collection System	PM	PM	PM	PM
6	Earthen Acid Dump Pit	D	D	PH	PM
7	Slag Storage Pile	PM	PM	PM	PM
8	Crushed Battery Storage Area	PM	PM	PM	PL
9	Hard Rubber Chip Storage Area	V	PM	PM	PL
10	Old Battery Separation Building	D	D	PH	PL
11	Old Mixed Metals Extrusion Bldg	PH	D	PH	PL
12	Zinc Alloy Operations Area	PH	D	PM	PL
13	Metal Warehouse	?	?	?	PL

SWMU #	Name	Soil	GW	SW	Air
14	Smelting Pots	D	PH	PH	PL
15	Lead Oxide Building & Warehouse	V	PH	PH	PL
16	Main Smelting Building	PH	PH	PH	PL
17	Blast Furnace Flue Bins	PH	PH	PH	PL
18	Main Smelting Building Baghouses	PM	PM	PH	PL
19	Crushed Battery Storage/Case Elevator	PH	PH	PH	PL
20	Radiation Lab/North Radiation Yard	PH	PM	PH	PL
21	Acid Tanks	PM	PM	PM	PL
22	Sumps	PM	PM	PM	PL
23	Mud and Dross Bins	PH	PM	PM	PL
24	Rainwater Retention Pond	V	PH	PH	PL
25	Truck Wash Pit	PH	PM	PM	PL
26	Truck Dumper	PM	PM	PM	PL
27	Battery Hopper/Oscillating Conveyor	PM	PM	PM	PL
28	Polypropylene Loading Dock	V	PH	PH	PL
29	Crushed Drum Storage Piles	V	PH	PH	PL
30	Battery Storage Areas	PH	PM	PM	PL
31	Reverbatory Furnace Feedback Room	PM	PM	PM	PL
32	Acid Tank and Battery Dump Bin Sump	PM	PM	PM	PL
33	Hammer Mill Conical Collector	PM	PM	PM	PL
34	Muds Holding Tanks	PM	PM	PM	PL
35	Baghouse Dust Slurry Sumps	PM	PM	PM	PL
36	Reverbatory and Soft Lead Baghouses	PM	PM	PM	PL
37	Blast Furnace Feedstock Room	PM	PM	PM	PL
38	Alloy Kettles & Casting Machinery	PM	PM	PM	PL
AOC 1	Two 10,000-Gal Fuel USTs	PM	PM	PM	PL

SWMU #	Name	Soil	GW	SW	Air
AOC 2	Solid Soda Ash Storage Tanks	PH	PM	PM	PL
AOC 3	Offsite Soils (added after RFA)	D	PL	PM	PM

II. ENVIRONMENTAL SIGNIFICANCE:

A. Hazardous Waste Exposure and Constituent Information

Instructions:

1. Designate as appropriate: D - documented evidence, V - visual evidence, P -potential for release. Specify documentation, who saw visual evidence, and/or rationale for potential release, if known.

2. Provide released or potentially released listed waste or constituent information to each appropriate media. Include volume of waste released, if known, toxicity, and physical state of contaminants.

3. Indicate whether release has already been remediated.

PM Imminent danger to public health/environment.

Immediate action required; explain: *DTSC Region 3 has documented the presence of lead contamination in offsite surface soils adjacent to the site. This surface soils contamination may pose an immediate hazard.*

YE Stabilization measures appropriate; explain: *Exposure controls or removal actions to prevent exposure to lead-contamininated offsite soils should be implemented. Additional interim measures onsite to prevent/minimize spread of contamination could also be implemented.*

D Release to soil. D V P *Documented releases of lead above Region 9 PRG of 400 ppm at several SWMUs as indicated in SWMU table.*

D Release to groundwater. D V P *Documented release of lead, TCE, and other contaminants to GW at units indicated in SWMU table.*

P Release to surface water. D V P *No documented releases to SW, potential releases are indicated in SWMU table.*

P Release to air. D V P *No documented releases to air, potential releases are indicated in SWMU table.*

_____ High Potential for Migration (media:)

_____ Sensitive environmental receptors onsite or within 3 miles Explain:

_____ No releases

Extent of Site Characterization (check one):

_X_ minimal ____ extensive ____ unknown

B. **Exposure Considerations**: (D - Documented, P - Potential)
Skip this section if there is no potential or documented release.

1. Groundwater (GW): If potential exposure is a concern, please specify whether release is "highly suspected" (HS). A highly suspected release to groundwater means that there is known soil contamination from a large volume of mobile constituents with high migration potential where there is no known aquiclude between contaminated soil and ground water.

____ Current GW drinking water source impacted

____ Sole Source (Class I) aquifer impacted

_X_ Impacts on potable water aquifer but not currently used for drinking

Depth to GW 70' GW flow direction WEST

Direction/Distance to nearby wells 0.7 mi. WEST

Population Served UNKNOWN

2. Surface Water (SW): Los Angeles River

NO SW drinking water source impacted

Direction/Distance to SW 0.1 mi. south

> 4 mi. Distance to sensitive environment related to SW contamination

> 4 mi. Distance to drinking water supply intake or contact point

Net Precipitation -10" 24 hour rainfall 3"

Permitted outfall yes Permit Violations yes

NO Flood prone area NO 100-yr flood plain

NO Fishing, recreation water source impacted

NO Irrigation, livestock water source impacted

The following near coastal waters and Estuary factors should not be considered in the initial staff prioritizing process. The information will be considered by management with the recommendation.

Check if contamination affects any of the following near coastal waters:

____ Apra Harbor (Guam)
____ Babelthaup Island Bays (Palau)
____ Kaiaka Bay (Hawaii)
____ Kailua Bay (Hawaii)
____ Kona Coast (Hawaii)
____ Morro Bay (California)
____ Pago Pago Harbor (American Samoa)
____ Pearl Harbor (Hawaii)
____ San Diego Bay (California)
____ Tijuana Estuary (California)

Check if contamination affects either of these Estuary projects:
____ San Francisco Bay/Delta
____ Santa Monica Bay

3. Air:

PH Blowing dust; nearby population

YES Air permits YES Permit violations

_PH_ Can contaminants migrate into air? *Airborne dust and soils containing lead .*

0.75 mi. Target Population < 4 miles *Nearest residential area, population unknown.*

4. On site:

Accessibility: inaccessible _____
limited access _____
poor security __X__

__X__ Observed surface soil contamination
Access to offsite surface soils contamination is unrestricted.

III. SITE ENVIRONMENTAL PRIORITY

Instructions: Assign priority based on technical considerations only. Final priority should be briefly explained in terms of potential exposure to human health and the environment based on the technical considerations in Sec. II.

__X__ High Priority

* Known or highly suspected release which has resulted in, or which has high potential for, exposure to human population and sensitive environments (other than near coastal waters and estuary project sites), in the short term (< 10 years). Choose this priority if there is known or highly suspected contamination to a sole source aquifer currently being used.

_____ Medium Priority

* Known or highly suspected release with potential for exposure to human health and sensitive environments (other than near coastal waters and estuary project sites) in the long term (> 10 years).

_____ Low Priority

* Known or highly suspected release, but unlikely adverse effect on human health and the environment.

_____ No Further Action

* No evidence of a release that could adversely affect human health and the environment.

__X__ NCAPS Priority High Medium Low

* Check if NCAPS has been completed and underline appropriate NCAPS-based priority. If the NCAPS-based priority does not agree with your assessment of priority, discuss below.

Comments/Rationale to support priority: Offsite soils are contaminated with lead from the site. Access to these areas is unrestricted, posing a possible immediate hazard. Soil and GW contamination onsite may also pose a potential risk to drinking water supplies.

IV. RCRA PERMITTING STATUS

A. Contact Person(s):

#	Name	Contact Date	Phone	Agency
1	Alan Sorsher	12/6/94	818/551-2892	DTSC-FPB

B. Current Status:

Instructions: For source, indicate file document or numeral for contact person listed above.

__X__ Operating RCRA TSDF; Source: RCRIS,1

____ Not Operating RCRA TSDF; Source:

____ Bankrupt Facility; Source:

____ Non-Notifying TSDF - should be a RCRA TSDF but didn't submit a Part A permit application. Source:

____ Generator only - never operated as a TSDF. Source:

__X__ Permitted TSDF or Seeking Permit; Source: RCRIS, 1

Part B Permit Application Submitted? Y N

Permit Application Review Lead (circle)
EPA STATE OTHER (specify)

Corrective Action in (draft) Permit? Y N (Draft permit not yet prepared.)

Expected Permit Issuance Date: fall 1995

____ Closed or Closing Facility; Source:

____ Post-Closure permit; Source:

____ Combination: some units closing, some seeking permit (i.e. partial closure).

____ Part A Withdrawal Candidate; Source:

____ RWQCB WDRs requiring investigation and/or remediation in Effect

V. OTHER REGULATORY ACTIVITIES RELEVANT TO CORRECTIVE ACTION

A. Contact Person(s):

#	Name	Contact Date	Phone	Agency
10	Nancy Steele	12/6/94	818/551-2868	DTSC-SEB

B. Activity
Instructions: mark all applicable; note any pertinent outstanding violations.

____ EPA Enforcement Action with Activities Relevant to Corrective Action; Source:

__X__ State Enforcement Activities Relevant to Corrective Action; Source: 1
Date: July 1994
Explain: Soil sampling conducted by SEB during the summer of 1994 confirmed the presence of lead contamination in offsite surface soils.

____ Regional Water Board Order or WDR Requiring Corrective Action; Source:

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VI. OVERALL STATE LEVEL OF INVOLVEMENT IN CLEAN-UP ACTIVITIES

(based on state actions, level of state staff person's oversight)

Mark one:

____ High ____ Medium ____ Low __X__ None

Rationale: There have been no cleanup activities to date. Corrective action has not yet been initiated.

VII. FACILITY WILLINGNESS/ABILITY TO PERFORM CORRECTIVE ACTION

____ Facility is cooperative

____ Facility is uncooperative; Explain:

__X__ Unknown

____ Facility may be financially unable to complete work.

VIII. RECOMMENDATION FOR FURTHER ACTION (mark all applicable)

Instructions: Consider factors in Sections I - VII to arrive at final recommendation for further action. If several actions are recommended, prioritize as Action 1, 2, etc.

____ Imminent and substantial danger to human health or the environment requires issuance of RCRA 7003 Order and/or CERCLA 106 Order.

__X__ Stabilization evaluation completed

- __X__ Stabilization required
- ____ Stabilization not required
- ____ Stabilization not feasible
- ____ Further investigation necessary

____ Issue RCRA 3013 order. Release of hazardous waste presents a substantial hazard to human health or the environment (investigation only).

____ Refer to CERCLA for further follow-up.

__X__ No further CERCLA action

____ Conduct an RFA

____ Use a 3007 letter to obtain more information regarding the following items:

____ Negotiate 3008(h) Consent Order

____ Incorporate corrective action into post-closure permit through 3004(u) and (v).

__1__ Incorporate corrective action into permit through 3004(u) and (v).
Allen Sorsher, Unit Chief in DTSC Region 3 permitting branch, has agreed to include corrective action in the permit scheduled to be issued by the fall of 1995.

____ Include corrective action in closure plan (surface releases near regulated units)

____ Ongoing or planned State action is sufficient to address release(s).

____ No further RCRA action at present; re-evaluate next year.

____ No further RCRA action.

_____ Recommendation Accepted

_____

Larry Bowerman, Chief
Corrective Action Section

Environmental Benefits:

Raise priority to _____ due to near coastal waters impacts.

Raise priority to _____ due to estuary project impacts.